

**UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
WACO DIVISION**

OPTICAL LICENSING, LLC,

Plaintiff

v.

ARROW ELECTRONICS, INC.,

Defendant

Case No. 6:21-cv-00186

JURY TRIAL DEMANDED

COMPLAINT FOR PATENT INFRINGEMENT

Plaintiff Optical Licensing, LLC (“Optical” or “Plaintiff”) files this Complaint for patent infringement against Arrow Electronics, Inc. (“Defendant”), and alleges as follows:

NATURE OF THE ACTION

1. This is an action for patent infringement arising under 35 U.S.C. § 1 *et seq.*

PARTIES

2. Optical is a limited liability company organized and existing under the laws of the State of Texas with its principal place of business in Plano, Texas.

3. Upon information and belief, Defendant is a corporation organized and existing under the laws of New York with a principal place of business at 1908 Kramer Lane, Suite 200, Austin, Texas 78758.

JURISDICTION AND VENUE

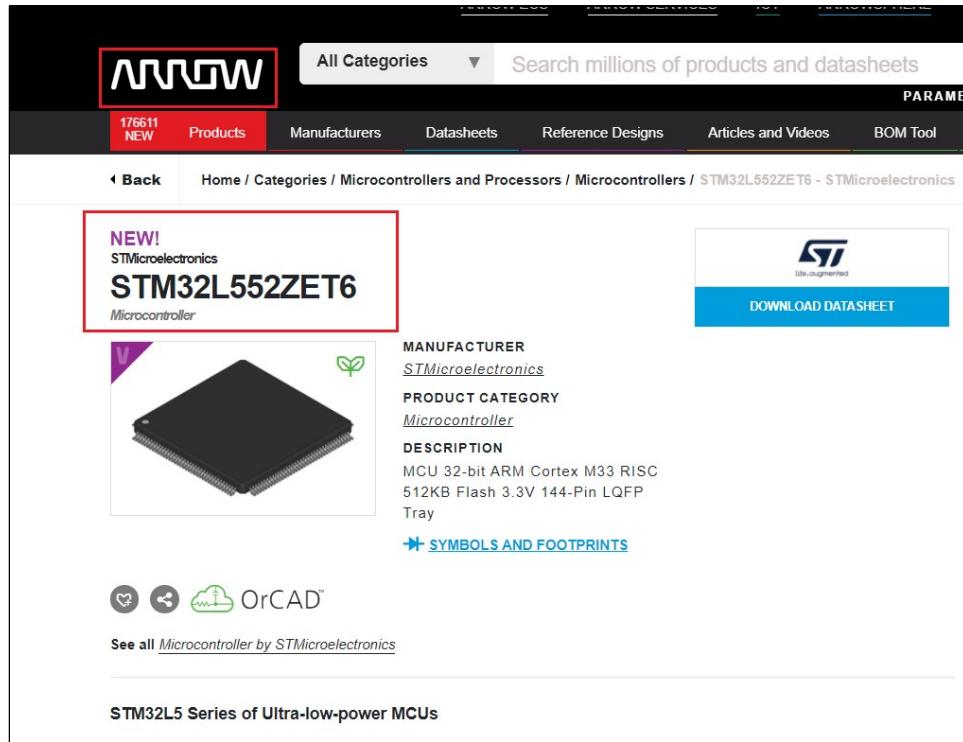
4. This Court has original jurisdiction over the subject matter of this action pursuant to 28 U.S.C. §§ 1331 and 1338(a).

5. Upon information and belief, Defendant is subject to personal jurisdiction of this Court based upon it having regularly conducted business, including the acts complained of herein, within the State of Texas and/or deriving substantial revenue from goods and services provided to individuals in Texas and in this District.

6. Venue is proper in this District under 28 U.S.C. § 1400 because Defendant has committed acts of infringement and has regular and established places of business in this judicial district.

IDENTIFICATION OF THE ACCUSED PRODUCT

7. Defendant sells and offers for sale the STMicroelectronics STM32L552ZET6 microcontroller, which includes RAM and a RAM controller for providing asynchronous and synchronous memory access.



A data sheet providing additional descriptions, operations, and features is available at

<https://static6.arrow.com/aropdfconversion/1da1e143d60c11973e8e5c61d77611c471a34c5c/en.d00504265.pdf>.

COUNT I
(Infringement of U.S. Patent No. 6,791,898)

8. Optical incorporates the above paragraphs as though fully set forth herein.
9. Plaintiff is the owner, by assignment, of U.S. Patent No. 6,791,898 (the "898 Patent"), entitled MEMORY DEVICE PROVIDING ASYNCHRONOUS AND SYNCHRONOUS DATA TRANSFER, which issued on September 14, 2004. A copy of the '898 Patent is attached as Exhibit PX-898.

10. The '898 Patent is valid, enforceable, and was duly issued in full compliance with Title 35 of the United States Code.

11. Defendant has been and is now infringing one or more claims of the '898 Patent under 35 U.S.C. § 271 by making, using, selling, and offering to sell the Accused Product in the United States without authority.

12. Claim 7 of the '898 recites:

7. A memory device comprising:
an array of memory cells for storing data;
an asynchronous/synchronous logic coupled to a plurality of control signals and said array of memory cells, wherein asynchronous transfer of data stored in said array of memory cells is provided based upon a first state of said control signals and wherein synchronous transfer of data stored in said array of memory cells is provided based upon a second state of said control signals; and
a configuration register coupled to said asynchronous/synchronous logic, wherein said first state of said control signals or said second state of said control signals is latched for access by said asynchronous/synchronous logic.

13. Defendant infringes at least claim 7 of the '898 Patent by selling, using, and offering to sell the Accused Product.

14. For example, the Accused Product is a memory device.

15. The Accused Product comprises an array of memory cells for storing data.

16. The Accused Product comprises an asynchronous/synchronous logic coupled to a plurality of control signals and the array of memory cells, wherein asynchronous transfer of data stored in the array of memory cells is provided based upon a first state of the control signals and wherein synchronous transfer of data stored in the array of memory cells is provided based upon a second state of the control signals.

17. The Accused Product comprises a configuration register coupled to the asynchronous/synchronous logic, wherein the first state of the control signals or the second state of the control signals is latched for access by the asynchronous/synchronous logic.

18. Plaintiff has been damaged by Defendant's infringing activities.

PRAYER FOR RELIEF

WHEREFORE, Plaintiff respectfully requests the Court enter judgment against Defendant:

1. declaring that the Defendant has infringed the '898 Patent;
2. awarding Plaintiff its damages suffered as a result of Defendant's infringement of the '898 Patent;
3. awarding Plaintiff its costs, attorneys' fees, expenses, and interest; and
4. granting Plaintiff such further relief as the Court finds appropriate.

JURY DEMAND

Plaintiff demands trial by jury, Under Fed. R. Civ. P. 38.

Dated: February 28, 2021

Respectfully submitted,

/s/ Raymond W. Mort, III
Raymond W. Mort, III
Texas State Bar No. 00791308
raymort@austinlaw.com

THE MORT LAW FIRM, PLLC
100 Congress Ave, Suite 2000
Austin, Texas 78701
Tel/Fax: (512) 865-7950

ATTORNEYS FOR PLAINTIFF
AERITAS, LLC